

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

TNS MEDIA RESEARCH, LLC (d/b/a
KANTAR MEDIA AUDIENCES) and
CAVENDISH SQUARE HOLDING, B.V.,

Plaintiffs,

v.

TIVO RESEARCH AND ANALYTICS,
INC.,

Defendant

CIVIL ACTION NO.: 11 CIV. 4039
(SAS)

ECF CASE

TIVO RESEARCH AND ANALYTICS,
INC.,

Counterclaim Plaintiff,

v.

TNS MEDIA RESEARCH, LLC (d/b/a
KANTAR MEDIA AUDIENCES);
CAVENDISH SQUARE HOLDING, B.V.;
WPP PLC; WPP GROUP USA, INC.;
KANTAR GROUP LTD.; and KANTAR
RETAIL AMERICA, INC.

Counterclaim-Defendants.

**COUNTERCLAIM-DEFENDANTS’
NOTICE OF MOTION FOR ATTORNEYS’ FEES**

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 54(d), 35 U.S. C. § 285, and the Court's inherent power, Counterclaim-Defendants TNS Media Research, LLC (d/b/a Kantar Media Audiences); Cavendish Square Holding, B.V.; WPP plc; WPP Group USA, Inc.; Kantar Group Ltd.; and Kantar Retail America, Inc. move for their attorneys' fees and non-taxable expenses incurred defending against TRA's patent and trade secret claims, and pre-judgment and post-judgment interest thereon. This motion is based on Counterclaim-Defendants' Memorandum of Law in Support of Their Motion for Attorneys' Fees and the Declaration of Eric Rutt, and exhibits thereto, filed herewith.

Respectfully submitted,

TNS MEDIA RESEARCH, LLC (d/b/a
KANTAR MEDIA AUDIENCES);
CAVENDISH SQUARE HOLDING, B.V.;
WPP PLC; WPP GROUP USA, INC.;
KANTAR GROUP LTD.; and KANTAR
RETAIL AMERICA, INC.

By their attorneys,

Dated: July 16, 2014

/s/ Marc J. Rachman

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CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

Any documents filed "Under Seal" will be served on counsel for TRA by electronic means, per agreement of the parties.

/s/ Marc J. Rachman